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*Attorneys for Defendants*

<b>IN THE UNITED STATES DISTRICT COURT</b> <b>FOR THE DISTRICT OF UTAH, CENTRAL DIVISION</b>	
<p>VIA GROUP PARTNERS, LLC, a Utah limited liability company,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>CHRISTINE BARANOWSKI, an individual, FRANK CLARK, an individual, STEPHEN LEE, an individual, and ENCORE LEADERSHIP, LLC, a Utah limited liability company,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;"><b>DECLARATION OF CHRISTINE BARANOWSKI</b></p> <p style="text-align: center;">Case No.: 2:21-cv-00694-TC</p> <p style="text-align: center;">Judge Tena Campbell</p>

I, Christine Baranowski, declare as follows:

1. My name is Christine Baranowski, and I am a named defendant in this action.
2. I am over the age of eighteen years and competent to testify to the matters set forth in this declaration.
3. I have personal knowledge of the facts attested to in this declaration.
4. I am a resident and citizen of the state of Oregon.
5. I have never resided in Utah.
6. I have never conducted business in Utah.
7. I have never owned real or personal property located in the state of Utah.

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8. I have never opened, maintained or held a bank account in Utah.
9. I have not traveled to Utah for business or recreational purposes.
10. I worked for the Plaintiff, Via Group Partners, LLC, from approximately August 2020 until September 2021.
11. During such time, I worked out of my home in Oregon.
12. While I worked for Plaintiff, I never traveled to Utah for business.
13. While I worked for Plaintiff, I did not perform any work or services for any customers located in Utah, or direct any of my activities towards companies or businesses located in Utah.
14. While I worked for Plaintiff, I did not meet with any prospective customers or customers in Utah.
15. I did not utilize the internet, websites, social media or any other services to purposeful direct solicitations and/or inquires to individuals in Utah during the time I worked for Plaintiff.
16. My activities in working for Plaintiff did not have any connection to Utah.

I hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that the foregoing is true and correct.

DATED this 22 day of December 2021.



Christine Baranowski  
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